

REMARKS

Upon entry of the present Reply, claims 1, 3, 5, 8, 12, 13, 15, 16 and 18 will have been amended to correct informalities in the claim language and to more clearly define the invention, including deleting reference to an "advanced intelligent" network service, while not substantially affecting or narrowing the scope of these claims. Applicants respectfully submit that all pending claims are in condition for allowance.

In the above-referenced Official Action, the Examiner rejected claims 1–20 under 35 U.S.C. § 103(a) as being unpatentable over KOCH (U.S. Patent Application Publication No. 2004/0111269) in view of PINES et al. (U.S. Patent Application Publication No. 2003/0007625). Applicants respectfully traverse the Examiner's rejection, at least for the reasons stated below.

Claims 1 and 8 recite analyzing an announcement identification to determine a remote customer location where an announcement corresponding to the announcement identification is stored. Similarly, claim 15 recites determining a remote customer location where an announcement corresponding to the announcement identification is stored. This feature (*i.e.*, a remote "customer" location) was added in Applicants' Reply under 37 C.F.R. § 1.112, filed May 8, 2006, referencing paragraph [0035] of the Specification. The Examiner has not even addressed this feature, which does not appear to be taught or suggested by any proper combination of KOCH and PINES et al.

Furthermore, the Examiner admitted that KOCH does not disclose sending an announcement identification to a voice extensible markup language platform.

The Examiner therefore relied on PINES et al. to teach receiving and analyzing an announcement identification at a VXML platform to determine a remote location where an announcement corresponding to the announcement identification is stored.

However, the portion of PINES et al. on which the Examiner relied does not teach determining a remote customer location where an announcement is stored based on analyzing an announcement identification. Rather, PINES et al. teach determining a "closing prompt" announcement by populating predetermined fields, as opposed to determining a remote customer location at which the announcement is already stored. See paras. [0134]-[0142]. For example, a Closing Prompt Module 27 accesses a Call Completion Data Table 68 to determine the closing prompt based on the information fields contained therein, such as the Number Dialed by Requester field 60A, the Data Source of the Requested Listing field 60B, the Types of Data field 60C, the Service Requested field 60D, the Preferred Language field 60E, the NPA/NXX of destination number field 60F and Other Listing Table 52A and/or Database 18 data field 60G. Para. [0135]. The Closing Prompt Module 27 uses these fields "to tailor a closing prompt to allow for targeted third party advertising" Para. [0143]. In other words, although PINES et al. may obtain data with which to populate the fields from various locations, they do not teach or suggest obtaining the announcement itself from a remote customer location.

Further, the portion of PINES et al. on which the Examiner relied does not disclose creating or changing an announcement without affecting the

corresponding announcement identification. See para. [0211]. Rather, PINES et al. disclose prompting a subscriber to update, create and/or delete his or her wireless apparatus identification number (WAIN) listing in Database 18. It appears that, while this information may be used to change a prompt, it does not teach or suggest creating or changing the announcement itself, as recited in the claims.

Also, there is no proper motivation to combine the teachings of KOCH and PINES et al., and there is no motivation articulated by the Examiner. KOCH is directed to a personal interactive voice response system with a web-based interface that enables a user to specify treatment of incoming calls based on responses by a calling party. See Abstract; para. [0009]. In contrast, the PINES et al. patent is directed to a system and method for efficiently acquiring wireless service subscriber information, such as wireless telephone or pager identification numbers, by populating a database of wireless service subscribers. See paras. [0005]; [0015]. The Examiner has thus used impermissible hindsight in formulating the posited rejection of the claims, and further has not provided any objective evidence of why one of ordinary skill in the art would have been motivated to modify KOCH with the teachings of PINES et al.

Accordingly, for all of the reasons stated above, it is requested that the Examiner withdraw the rejections of claims 1, 8, and 15 and provide an indication of their allowability.

With regard to claims 2–7, 9–14 and 16–20, Applicants assert that they are allowable at least because they depend, directly or indirectly, from

independent claims 1, 8 and 15, respectively, which Applicants submit have been shown to be allowable.

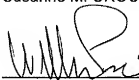
Further, dependent claims 2-7, 9-14 and 16-20 are also believed to recite features which define further patentable subject matter of the invention. For example, claims 2, 9 and 16 relate to a voice interactive media server (VIMS) component, in addition to an IP component. The portion relied upon by the Examiner (paragraph 36 and Fig. 1) lacks these features, and merely describes an element having an ordinary IP component. Claims 3, 10, and 17 further recite recognizing that the VIMS component will perform the processing based upon how the announcement ID has been encoded. Not only does KOCH lack the claimed VIMS component, but KOCH also lacks any encoding that indicates that a VIMS component should perform processing. As such, allowance of the dependent claims is deemed proper for at least the same reasons noted for the independent claims, in addition to reasons related to their own recitations. Accordingly, Applicants respectfully request reconsideration of the outstanding rejections and an indication of the allowability of all of the claims in the present application.

In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of previously asserted rejections set forth in the Official Action of June 18, 2006, together with an indication of the allowability of all pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

Any amendments to the claims in this Reply, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions concerning this Amendment or the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully Submitted,
Susanne M. CROCKETT et al.



Bruce H. Bernstein
Reg. No. 29,027

William Pieprz
Reg. No. 33630

October 10, 2006
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191